

**IN UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>CASE NO.: 1:15-CR-275</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>JUDGE: DAN AARON POLSTER</b>
	)	
<b>vs.</b>	)	
	)	
	)	<b><u>DEMAND FOR DISCOVERY</u></b>
	)	
<b>JOHN CLEMENTS</b>	)	
	)	
<b>Defendant.</b>	)	

Now comes the Defendant, John Clements, by and through Counsel, Joseph Patituce, of Patituce and Associates, LLC, and hereby requests, pursuant to Federal Rule of Criminal Procedure 16, that the United States of America provide the Defendant with the following information:

- A. 1) The substance of any relevant oral statements made by the Defendant before or after arrest;  
2) Copies of all written and/or recorded statements by the Defendant;  
3) Recorded testimony of the Defendant before a grand jury;
- B. The Defendant's prior criminal record;
- C. Copies of or permit inspection and copies or photographs of any and all books, data, tangible objects, building or places, photographs, papers, tape recordings, video recordings, documents, or other written material available to or within the possession, custody or control of the United States of America which are material to the preparation of the defense of this matter, or which are intended for use by the United States Attorney as evidence at the trial of this matter, or which were obtained from or belong to Defendant;
- D. Copies of results or reports of any physical or mental examinations, and of any scientific tests or experiments, made in connection with this matter, which are available to or within the possession, custody or control of the United States of America, the existence of which is known or by the exercise of due diligence may become known to the United States Attorney.

- E. A written summary of any witness testimony that the United States of America intends to use under rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial including witness opinions, the basis and reason for those opinions, and the witness' qualifications;
- F. All evidence which is known or may become known to the United States Attorney which is favorable to the Defendant and material either to guilt, innocence, or punishment; and
- G. All other items discoverable under the Federal Rules of Procedure.

Respectfully Submitted,

**PATITUCE & ASSOCIATES, LLC**

**By: /s/ Joseph C. Patituce**  
Joseph C. Patituce (#0081384)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of July, 2015, a copy of the foregoing Demand for Discovery was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

**/s/ Joseph C. Patituce**  
Joseph C. Patituce (#0081384)  
Attorney for Defendant